

**PULMOTIP MEDİKAL SAN. ve TİC. A. Ş. INFORMATION NOTICE FOR  
SUPPLIER - CUSTOMER - BUSINESS PARTNER- REAL PERSON ON THE  
PROTECTION OF YOUR PERSONAL DATA IN ACCORDANCE WITH THE  
TURKISH PERSONAL DATA PROTECTION LAW NO 6698**

**PULMOTIP MEDİKAL SAN. ve TİC. A. Ş.** attaches importance to the protection of the personal data of its web site's visitors, customers and suppliers in accordance with Article 10 of the Personal Data Protection Law No. 6698 (Law), titled "Information Obligation of Data Controller" and other relevant articles thereof and provisions in the Communiqué on Principles and Procedures to be Followed in Fulfillment of the Obligation to Inform, which is published in the Official Gazette of 10.03.2018. In this context, this Information Notice is drafted and announced. This information notice is intended for our web site's visitors, our customers and suppliers.

As your personal data can be collected in accordance with Article 10 of the Turkish Personal Data Protection Law No. 6698 ("Law") and European Union General Data Protection Regulation ("GDPR"), we are required to make a disclosure on the collection method of the personal data, its legal grounds, the purposes for which your personal data is processed by our Company, third parties to whom your personal data is disclosed/transferred and the purpose for which they are disclosed and your rights you are able to exercise as a data subject.

#### **IDENTITY OF THE DATA CONTROLLER**

**PULMOTIP MEDİKAL SAN. ve TİC. A. Ş.** is the data controller in accordance with the foregoing regulations. It operates at **Çınar Mahallesi 5003 Sk. No: 2 /2/103 Bornova/İZMİR**. You can reach out our Company via [info@pulmotip.com](mailto:info@pulmotip.com). Web address of our Company is <https://pulmotip.com/>

#### **PERSONAL DATA**

Pursuant to Article 3 of the Law, personal data refers to any information related to an identified or identifiable natural person. In this context, the data that may be used to identify a natural person should be considered personal data.

#### **Processed Personal Data:**

- Identity Information
- Contact Information
- Legal Transaction
- Customer Transaction
- Physical Venue Security Information
- Transaction Security
- Risk Management
- Financial Information
- Audio and Visual Recordings
- Health Information

#### **Data Subject Group:**

- Person subject to the news
- Potential Product or Service Buyer
- Supplier's Employee

- Supplier's Official
- Person Buying a Product or Service

## RETENTION OF DATA

Personal data that we may process in accordance with the Law shall be deleted, destroyed or anonymized at the end of the retention period by the Company ex officio or on your request, in the event that the reasons for the processing no longer exist in accordance with the provisions of PDP Law, Regulation on Deletion, Destruction and Anonymization of Personal Data and other legislation. We reserve our obligations under any legislation, which we need to retain your personal data, in particular regarding financial consultancy, lawyer, independent audit legislation, Capital Market Law and Turkish Commercial Code.

## PROCESSED PERSONAL DATA AND PROCESSING PURPOSES

Your collected personal data may be processed by the Company in accordance with the basic principles stipulated by the Law and within the terms and purposes of personal data processing specified in Articles 5 and 6 of the Law for the following purposes:

• Obtaining the necessary information for the formation of agreements,
• Seeking offers for the supply of goods and services,
• Enforcing the agreement concluded by and between us,
• Fulfillment of mutual obligations,
• Communication between us,
• Realizing the purchase of goods and services under the agreements,
• Keeping the finance and accounting records, performing the payment transactions
• Complying with our legal obligations under the agreements,
• Meeting the daily needs of the Company,
• Conducting the Technical Services,
• Request/Complaint Follow-up
• Ensuring the Security of Data Controller's Operations,
• We share them with the courier company if we need to deliver a product.
• Creating your record on the program we are using,
• Holding organizations,
• Conducting/Auditing Business Activities
• Conducting Risk Management Process
• Conducting Retention and Archive Activities
• Conducting and Following legal processes
• Complying with the legal obligations,

<ul style="list-style-type: none"> <li>• Ensuring audit and management</li> </ul>
<ul style="list-style-type: none"> <li>• Providing security,</li> </ul>
<ul style="list-style-type: none"> <li>• Completing necessary trainings,</li> </ul>
<ul style="list-style-type: none"> <li>• Confirming eligibility for the job,</li> </ul>
<ul style="list-style-type: none"> <li>• Providing necessary protective materials,</li> </ul>
<ul style="list-style-type: none"> <li>• Providing after sales support,</li> </ul>
<ul style="list-style-type: none"> <li>• Improving the service by creating a record,</li> </ul>
<ul style="list-style-type: none"> <li>• Ensuring patient satisfaction,</li> </ul>
<ul style="list-style-type: none"> <li>• Communication activities,</li> </ul>
<ul style="list-style-type: none"> <li>• Transferring Patient's Information on the ÜTS (Product Tracking System) System in accordance with Quality Standards</li> </ul>
<ul style="list-style-type: none"> <li>• Processing of Patient Information on Invoice Records in Patient-Specific Products</li> </ul>
<ul style="list-style-type: none"> <li>• Providing for by the laws</li> </ul>
<ul style="list-style-type: none"> <li>• Conducting technical service operations and medical device sales for the execution of medical diagnosis and treatment processes</li> </ul>
<ul style="list-style-type: none"> <li>• Execution of Risk Management Processes</li> </ul>

## TRANSFER OF PERSONAL DATA

If any of the conditions set out in Paragraph 2 of Article 5 of the Law are satisfied and limited to the purposes listed herein, the personal data may be directly or indirectly transferred by the **company** to our shareholders at home, business partners, suppliers, **Company's** Employees in order to conduct business processes, competent public institutions and organizations and authorized private persons or entities provided that the necessary security measures are taken within the framework of the conditions specified in Articles 8 and 9 of the Law.

**The transfer of Personal Data is subject to the explicit consent of the data subject in the absence of any of the conditions in paragraph 2 of Article 5 of the Law.**

## COLLECTION METHOD OF PERSONAL DATA AND LEGAL GROUNDS

Your personal data; the information that you provide us through our corporate websites or by email or other means, or during our business relationships, during the signing of commercial contracts and/or during the commercial relationship process, filling out the contact form when visiting our website, through various forms such as physical forms, is stored in various ways, provided that it is orally, in writing or electronically.

Your personal data may be processed by the Company in the capacity of Data Controller under the Law for a period required by the legislation and in order to provide you with better service, to carry out informational communications related to our services, to collect and compile statistical information and to improve its business activities. Your personal data may be shared with the public institutions and organizations that our company cooperates or is legally obliged to and/or 3rd party natural persons/legal entities, service providers, suppliers and insurance companies residing in Turkey or abroad, in case of legal or service-related de-facto requirements, it may be transferred abroad in case of legal or

service-related de-facto requirements, may be processed in accordance with the legal compliance reasons those listed in Articles 5 and 6 of the Law and those listed below.

- ➤ It is provided for by the laws.
- ♦ Turkish Commercial Code No. 6102,
- ♦ Tax Procedure Law No. 213,
- ♦ Personal Data Protection Law No. 6698
- ♦ Turkish Civil Code No. 4721,
- ♦ Code of Obligations No. 6098,
- ♦ Law on Regulation of Publications on the Internet and Suppression of Crimes Committed by Means of Such Publications No. 5661,
- ♦ Medical Device Directive No. 93/42/EEC,
- ♦ Active Implantable Medical Devices Directive No. 90/385/EEC,
- ♦ In Vitro Diagnostic Medical Devices Directive,
- ➤ Provided that the processing shall not violate the fundamental rights and freedoms of the data subject, processing of data is necessary for the legitimate interests pursued by the data controller.
- ➤ Processing of personal data of the parties to an agreement is necessary, provided that it is directly related to the establishment or performance of the agreement (This includes the personal data provided by our customers for whom we provide independent audit services),
- ➤ It is necessary to offer the requested products and services and to meet the requirement of the agreement you have concluded,
- ➤ It is necessary for compliance with a legal obligation,
- ➤ Processing of personal data is necessary for the establishment, use or protection of a right,

## **RIGHTS OF PERSONAL DATA SUBJECTS**

Under Article 11 of the Law, everyone shall have the following rights to be exercised by applying the Company;

- a) To learn whether the personal data has been processed,
- b) To request information if the personal data has been processed,
- c) To learn the purpose of personal data processing and whether this data is used for intended purposes,
- c) To know the third parties to whom the personal data is transferred at home or abroad,
- d) To request rectification in case personal data are processed incompletely or inaccurately,
- e) To request deletion or destruction of the personal data under the conditions set out in Article 7 of the Law,
- f) To request notification of the operations made as per above paragraphs (d) and (e) to third parties to whom the personal data have been transferred,
- g) To object any result that is to his detriment by means of an analysis of personal data exclusively through automated systems and
- ğ) To request compensation for his damages arising due to the unlawful processing of the personal data.

## **CONTACT DETAILS FOR YOUR RIGHTS AND REQUESTS**

For the personal data falling under the General Data Protection Regulation, the relevant persons have the right to request a copy of their personal data they submitted to **PULMOTIP MEDİKAL SAN. ve TİC. A.Ş.** and to request to be sent them to any other organization (or to request it from us if technically applicable) when the personal data is processed by **PULMOTIP MEDİKAL SAN. ve**

**TİC. A.Ş.** On the legal ground of the explicit consent of the data subject or execution of an agreement and when the data is automatically processed.

You may personally submit the signed copy of the [Application Form](#) for your above-listed rights, by filling in it according to the specified instructions, to **PULMOTIP MEDİKAL SAN. ve TİC. A. Ş., Çınar Mahallesi 5003 Sk. No: 2 /2/103 Bornova/İZMİR** together with the proof of your identity, or you may send it through notary public or by other methods specified in the Law. Depending on the nature of your request, your applications shall be concluded free of charge in the shortest possible time and no later than thirty days; however, if the transaction requires additional costs, the Company reserves the right to charge you a fee in the tariff set by the Personal Data Protection Board.

#### **DATA CONTROLLER CONTACT DETAILS**

**PULMOTIP MEDİKAL SAN. ve TİC. A. Ş.**  
**Central Registration System No: 0334053379500001**  
**E-Mail: [info@pulmotip.com](mailto:info@pulmotip.com)**  
**Address: Çınar Mahallesi 5003 Sk. No: 2 /2/103 Bornova/İZMİR**